

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

**UNITED STATES OF AMERICA**

**V. CASE NO.: 4:19-cr-00212-JM**

**KESHAWN BOYKINS**

**MOTION FOR DETENTION HEARING**

Comes now the Defendant, KESHAWN BOYKINS, by his attorney, Mark Alan Jesse, and for his motion states:

1. Defendant's pre-trial release status was previously revoked.
2. Defendant's previous counsel was relieved and undersigned counsel was appointed to substitute.
3. Defendant insists that his previous counsel failed to call witnesses at the revocation matter which could have supported a release plan and would have influenced the court and thus claims he was denied full consideration.
4. Defendant's trial has been continued to a later date.
5. One factor the court may consider is the length of time a defendant may remain in custody while a case is pending and set for trial.

6. Defendant asserts that with the delay incurred by the substitution of counsel and the continuance of the trial date, that the court should reconsider his release status as the circumstances have changed since the last hearing.

**WHEREFORE**, Defendant moves for a detention hearing.

Respectfully submitted,

Mark Alan Jesse  
Ar. Sup. Ct. No.: 92107  
Attorney for Defendant  
The Jesse Law Firm, P.L.C.  
425 West Broadway, Ste. E.  
North Little Rock, AR 72114  
(501) 375-4422  
E-Mail: [Jesselawfirm@aol.com](mailto:Jesselawfirm@aol.com)

### **CERTIFICATE OF SERVICE**

I hereby certify that on 6/30/2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to the following:

**Kristin Huntington Bryant**

U. S. Attorney's Office  
Eastern District of Arkansas  
Post Office Box 1229  
Little Rock, AR 72203-1229  
501-340-2600

[kristin.bryant@usdoj.gov](mailto:kristin.bryant@usdoj.gov)

*Assigned: 05/08/2019*

**LEAD ATTORNEY**

**ATTORNEY TO BE NOTICED**

representing **USA**  
*(Plaintiff)*

I hereby certify that on 6/30/2021, I mailed the document and a copy of the Notice of Electronic Filing (NEF) by United States Postal Service to the following non CM/ECF participants:

n/a

Mark Alan Jesse  
Ar. Sup. Ct. No.: 92107  
Attorney for Defendant  
The Jesse Law Firm, P.L.C.  
425 West Broadway, Ste. E.  
North Little Rock, AR 72114  
(501) 375-4422  
E-Mail: Jesselawfirm@aol.com